

ERIC GRANT
United States Attorney
BRITTANY M. GUNTER
Assistant United States Attorney
2500 Tulare Street, Suite 4401
Fresno, CA 93721
Telephone: (559) 497-4000
Facsimile: (559) 497-4099

Attorneys for Plaintiff
United States of America

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,
Plaintiff,

v.

RALPH CONTRERAS, JR.,
Defendant.

Case No: 1:25-CR-00119-KES-BAM

STIPULATION TO CONTINUE STATUS
CONFERENCE AND EXCLUDE TIME UNDER
SPEEDY TRIAL ACT; AND ORDER

THE PARTIES HEREBY STIPULATE, through their respective attorneys of record, Assistant United States Attorney Brittany M. Gunter, counsel for the government, and Eric Schweitzer, counsel for Ralph Contreras, Jr. (“the defendant”), that this action’s **Wednesday, December 10, 2025, status conference be continued to Wednesday, March 11, 2026, at 1:00 p.m.** The parties likewise ask the court to endorse this stipulation by way of formal order.

The parties base this stipulation on good cause, as follows:

1. The grand jury returned an indictment regarding this matter on June 12, 2025. ECF 13.

Since then, the government prepared and delivered an initial set of discovery to defense counsel within the time limits set forth by the Local Rules. The defense is and has been

reviewing discovery thus far provided.

2. The government produced supplemental discovery to the defense on October 21 and November 14, 2025. The government will follow up with law enforcement to determine the extent any additional supplemental discovery exists. If the government identifies additional information that should be produced as supplemental discovery, the government will promptly produce it to defense counsel in accord with Rule 16.
3. As defense counsel completes his analysis of the discovery produced in this case, counsel for the government will work with the defense and the HSI Fresno office to ensure that the defense is able to timely review, upon its request, any electronic evidence in this case in accord with relevant provisions of the Adam Walsh Act.
4. Defense counsel requires more time to complete his review of the discovery, complete additional investigation, discuss the case with the defendant, arrange for a review of the electronic evidence, and consider consulting with an expert.
5. By the time of the continued status conference and as all discovery is timely reviewed, the parties further intend to explore the extent this case can be resolved prior to trial. On November 20, the parties discussed whether the case could be resolved by plea agreement. Based on that conversation, the government is preparing a plea offer for the defendant, which it intends to extend to the defendant by December 5, 2025.
6. Defense counsel believes that failure to grant the above-requested continuance would deny him the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.
7. The government does not object to the continuance.
8. The parties therefore stipulate that the period of time from December 10, 2025, through and including March 11, 2026, is excludable pursuant to 18 U.S.C. §§ 3161(h)(7)(A) and 3161(h)(7)(B)(i) and (iv) because it results from a continuance granted by the Court at the parties' request on the basis of the Court's finding that the ends of justice served by taking

such action outweigh the best interest of the public and the defendant in a speedy trial.

IT IS SO STIPULATED.

Dated: November 21, 2025

ERIC GRANT
United States Attorney

By: /s/ BRITTANY M. GUNTER
BRITTANY M. GUNTER
Assistant United States Attorney

Dated: November 21, 2025

By: /s/ ERIC SCHWEITZER
ERIC SCHWEITZER
Attorney for Defendant
Ralph Contreras, Jr.

ORDER

IT IS ORDERED that the status conference currently set for December 10, 2025, at 1:00 pm is **continued to March 11, 2026, at 1:00 p.m. before Magistrate Judge Barbara A. McAuliffe.**

IT IS FURTHER ORDERED THAT the period of time from December 10, 2025, through and including March 11, 2026, is excluded pursuant to 18 U.S.C. §§ 3161(h)(7)(A) and 3161(h)(7)(B)(i) and (iv) because it results from a continuance granted by the Court at the parties' request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial.

IT IS SO ORDERED.

Dated: November 24, 2025

/s/ Barbara A. McAuliffe
UNITED STATES MAGISTRATE JUDGE